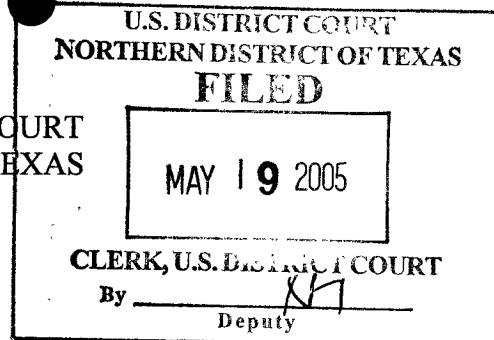


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ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



GW EQUITY LLC, GWBS, INC.  
and GREAT WESTERN BUSINESS  
SERVICES, LLC.

v.

PBS GLOBAL, INC. f/k/a PRUDENTIAL  
BUSINESS SERVICES, INC., JOHN  
PERSAUD, RICHARD MEIER, LAHNY  
McCRAY, DALE GRANGER, JOSEPH C.  
KISER, WAYNE LEE, WILLIAM JACOBS  
and FRED RODDA

NO. #3-05CV0.800-R

**MOTION TO DISMISS PLAINTIFFS' VERIFIED COMPLAINT AND FIRST  
AMENDED COMPLAINT AND APPLICATION FOR INJUNCTIVE RELIEF**

Come Defendants PBS Global, Inc., f/k/a Prudential Business Services, Inc., Fred  
Roddda, Bill Jacobs, and Dale Granger, by counsel pursuant to Fed. Rule of Civil Procedure  
12(b)(1), and move this Court to dismiss the above action.


As grounds therefore, counsel submits the attached memorandum of law in support of  
this motion to dismiss.

**MOTION TO DISMISS PLAINTIFFS' VERIFIED  
COMPLAINT AND FIRST AMENDED COMPLAINT AND  
APPLICATION FOR INJUNCTIVE RELIEF -Page 1**

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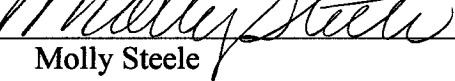
Respectfully submitted,

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ATTORNEYS FOR DEFENDANTS  
PBS GLOBAL, INC. F/K/A PRUDENTIAL  
BUSINESS SERVICES, INC., BILL JACOBS,  
DALE GRANGER AND FRED RODDA

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was hand delivered this 19th day of May, 2005, to:

**MCCREARY & STOCKFORD, LP**

David s. McCreary  
Cory S. Hartsfield  
18383 Preston Road, Ste. 150  
Dallas, Texas 75252-5476

  
Stuart E. Alexander III

**MOTION TO DISMISS PLAINTIFFS' VERIFIED  
COMPLAINT AND FIRST AMENDED COMPLAINT AND  
APPLICATION FOR INJUNCTIVE RELIEF -Page 2**

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